

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
---	------------------------------------

This document relates to:

*Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(FM)

**NOTICE OF MOTION FOR FINAL JUDGMENTS**

For the reasons set forth in the attached memorandum of law, the declaration of James P. Kreindler, and the declarations of the claimants, the *Ashton* plaintiffs by and through counsel, Kreindler & Kreindler LLP, respectfully move this Court to award final judgments for solatium damages to the non-immediate family members of decedents killed in the September 11, 2001 terror attacks identified herein against the Islamic Republic of Iran (“Iran”) for damages suffered as the result of acts of terrorism in the amounts set forth in the memorandum of law; and award prejudgment interest on those damages at the rate of 4.96%.

Dated: July 19, 2018  
New York, NY

/s/ James P. Kreindler  
James P Kreindler, Esq (7084)  
KREINDLER & KREINDLER LLP  
750 Third Ave, 32<sup>nd</sup> Fl  
New York, NY 10017  
(212) 973 – 8181  
Counsel for *Ashton* Plaintiffs